

# EXHIBIT J



**WAYNE STATE  
UNIVERSITY**

December 4, 2018

**PERSONAL AND CONFIDENTIAL**

Regarding Case Number: 2018039001

Access ID: [REDACTED]

Dear Margit,

I have concluded my investigation into the Complaint made on October 29, 2018 against WSU medical student [REDACTED] by former WSU student [REDACTED]. Attached you will find the investigation report, statements, and evidence.

Kind Regards,  
Nikolina

Nikolina Camaj  
Associate Director and Student Conduct Officer, Dean of Students Office

CC: Margit Chadwell, MD, FAAFP, Associate Dean of Student Affairs and Career Development, Wayne State University School of Medicine

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**Dean of Students Office**

5221 Gullen Mall  
301 Student Center  
Detroit, MI 48202

Phone: 313-577-1010  
Fax: 313-577-8061

doso.wayne.edu

Wayne State University  
Complaint Form

Submitted on October 29, 2018 at 3:14:32 pm EDT

Nature: N/A  
Urgency: N/A  
Incident Date and Time: 2018-10-26 2:00 PM  
Incident Location: Off campus Wherever I am he contacts me.

Reported by

Name: [REDACTED]  
Title: Former WSU student  
Email: [REDACTED]  
Phone: [REDACTED]  
Address: [UNAUTHENTICATED]

Involved Parties

[REDACTED] [REDACTED]  
[REDACTED]

Complaint

This complaint is about:  
**Other (not on list/unsure complaint)**

Please provide a detailed description of your concern/complaint using specific, concise, objective language.  
Write-In Answer

[REDACTED] has been harassing me since 2016. I met him at the fair where all the clubs are set up outside. It was before my freshman year began. I was at the biology tent and I met [REDACTED]. I told him I was on the premed track and taking bio 1510. He told me he had old exams he could send me and I thought wow, how helpful of this guy! After he sent me the materials I didn't hear from him for about a month. That is when he contacted me again saying that his accounts had been hacked, and he needed my email information to delete his cookies from the hack. He said he needed the personal passwords of everyone he had contacted recently to delete these "cookies". He said the connection was from sending me the documents. I'd like to add that those documents were sent through gmail. But he asked for my iCloud password and information. I refused to give it to him because it seemed next to impossible that that was a real situation. He texted me, Facebook messaged me, and contacted me through other social media extensively and I would not answer because I felt uncomfortable. I finally gave him a password for my account so he would stop continuously harassing me almost every single day. I thought all was fine until all of my social media accounts started getting hacked shortly thereafter. One time I was hacked and was able to track the location right to two crossroads on Wayne state's campus. I believe he is the one that has constantly hacked my accounts. After a while and thinking I was finally free of dealing with him, he comes back to say "there was an issue, I need your password again". I asked him to leave me alone where he took it upon himself to tell me that he "is the leader of the community at Wayne state and I could change your life". Those types of texts messages and harassment came quite often. I thought I was finally free of him till I received a text message about a month ago. He told me that his accounts got hacked again, and he went to the police. He said that the police gave him my address and phone number connected to the hacking (which I do not believe police would ever do, and also don't believe it's possible). He said that somehow from my phone and address his Snapchat account had been hacked and that our Snapchat accounts had become "linked"- which night I add, is virtually impossible. He said he needed my Snapchat password to fix this problem. I said leave me alone, do not contact me again. Then on Friday, I received a text from [REDACTED] saying to check my email because I should be expecting something from his lawyer. It was an email from a "lawyer" from the Wolff-Smith law firm saying I was suppose to appear in court on November 15, 2018 for small claims that he had filled against me. You will read in what I've done to resolve this that he impersonated a lawyer and tried to harass and

scare me with a fake court date. He has gone THIS far to try and get my Snapchat password- I assume for the pictures saved through the app. I assume that's why back then he wanted my iCloud information. For my pictures. I've also had three instances where someone has made fake accounts of me and contacted a previous photographer I did a photoshoot with and claimed I "lost the file with all the pictures from the shoot, can you resend it?" Luckily the photographer contacted the real me each time. I can't confirm it was [REDACTED], but I have a strong gut feeling. He has been harassing me for over two years and to go the far is absolutely mind blowing and disgusting on his part.

What have you done to resolve the situation? Include details of the people/offices contacted and the method of contact.

I called the Wolff-Smith law firm in lake Orion Michigan, to confirm that the email from [REDACTED]'s "lawyer" was not from them nor any of their lawyers. I called the 36th district court house and I am not on the docket for November 15, 2018.

What is the outcome you are requesting?

I am hoping he cannot do this to another student. He is abusing his power as being one of the top of the class at med school and using it as an in to harass people. I am hoping that he hasn't done this to anyone else, but I am not sure. I am hoping that he can be reprimanded for harassing me, for pretending to be a lawyer, and faking a court case, in attempt to get my passwords for my social media accounts. I wish for him to be held accountable for targeting impressionable female students and to no longer be harassed by him. As well as no other female student being harassed by him. If necessary I have all of the text messages he's ever sent me with proof. I'll include a few screenshots right now.

By clicking submit Completing this form, I declare that the information on this form is true, correct and complete to the best of my knowledge. I understand that any misinterpretation of information may result in disciplinary action as stipulated in the University's Student Code of Conduct.

**I AGREE**

#### Attachments

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*Pending IR #00000509*

*Submitted from 24.9.55.141 and routed to Nikolina Camaj (Associate Director and Student Conduct Officer, Dean of Students Office). Processed by routing rule #13.*

*Copies to: davidstrauss@wayne.edu; cneal@wayne.edu*



**Wayne State University  
Complaint Form**

*Submitted on October 29, 2018 at 3:14:32 pm EDT. Last modified October 29, 2018 at 4:34:46 pm EDT.*

Nature: **N/A**  
Urgency: **N/A**  
Incident Date and Time: **2018-10-26 2:00 PM**  
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Reported by

Name: [REDACTED]  
Title: **Former WSU student**  
Email: [REDACTED]  
Phone: [REDACTED]  
Address:

Involved Parties

[REDACTED] [REDACTED]  
[REDACTED]

Complaint

\*\* This complaint is about:  
Other (not on list/unsure complaint)

\*\* Please provide a detailed description of your concern/complaint using specific, concise, objective language.  
Write-In Answer

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I AGREE

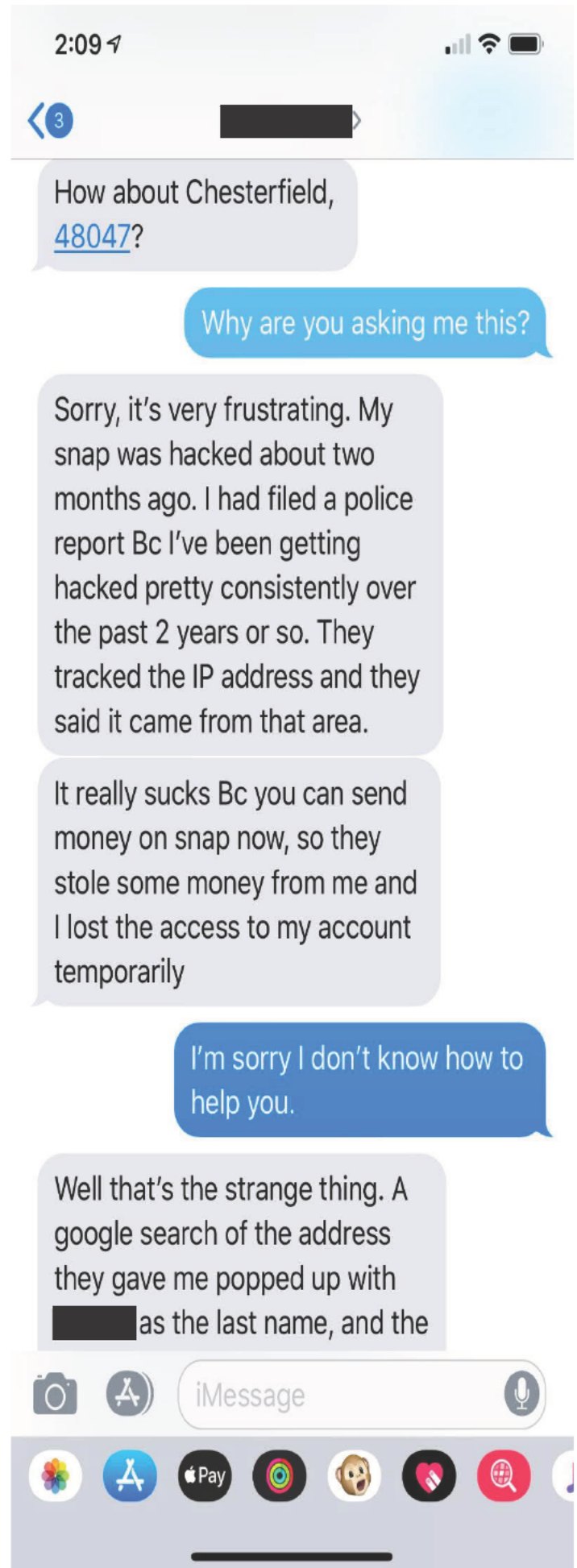
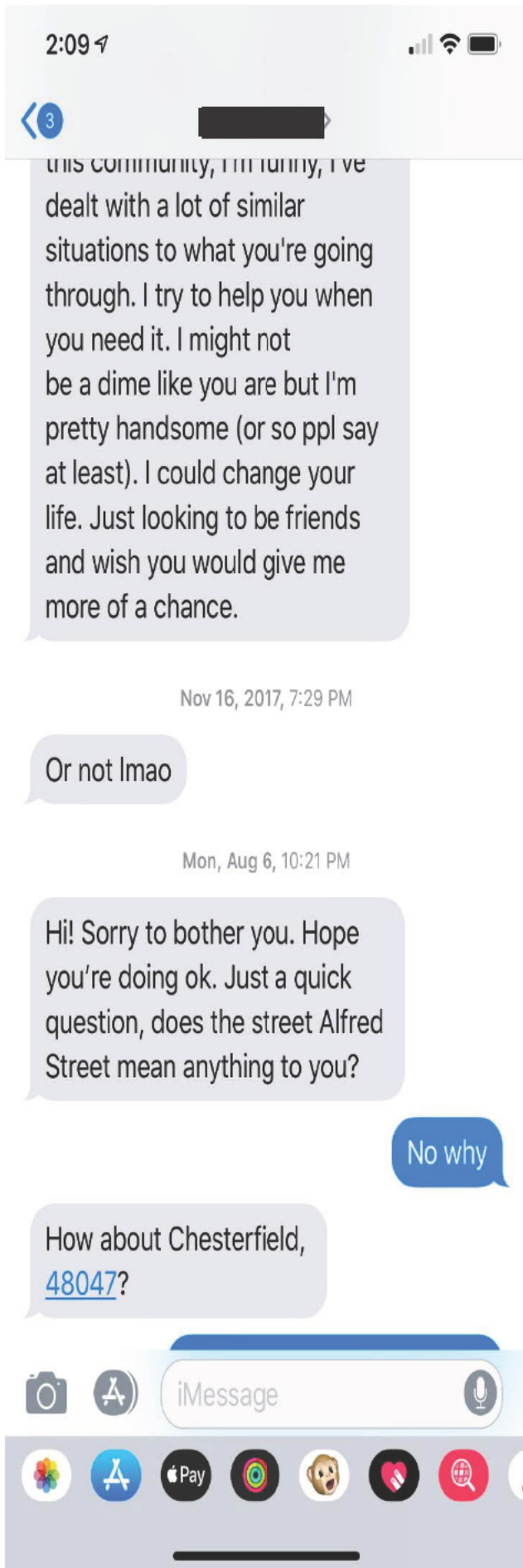
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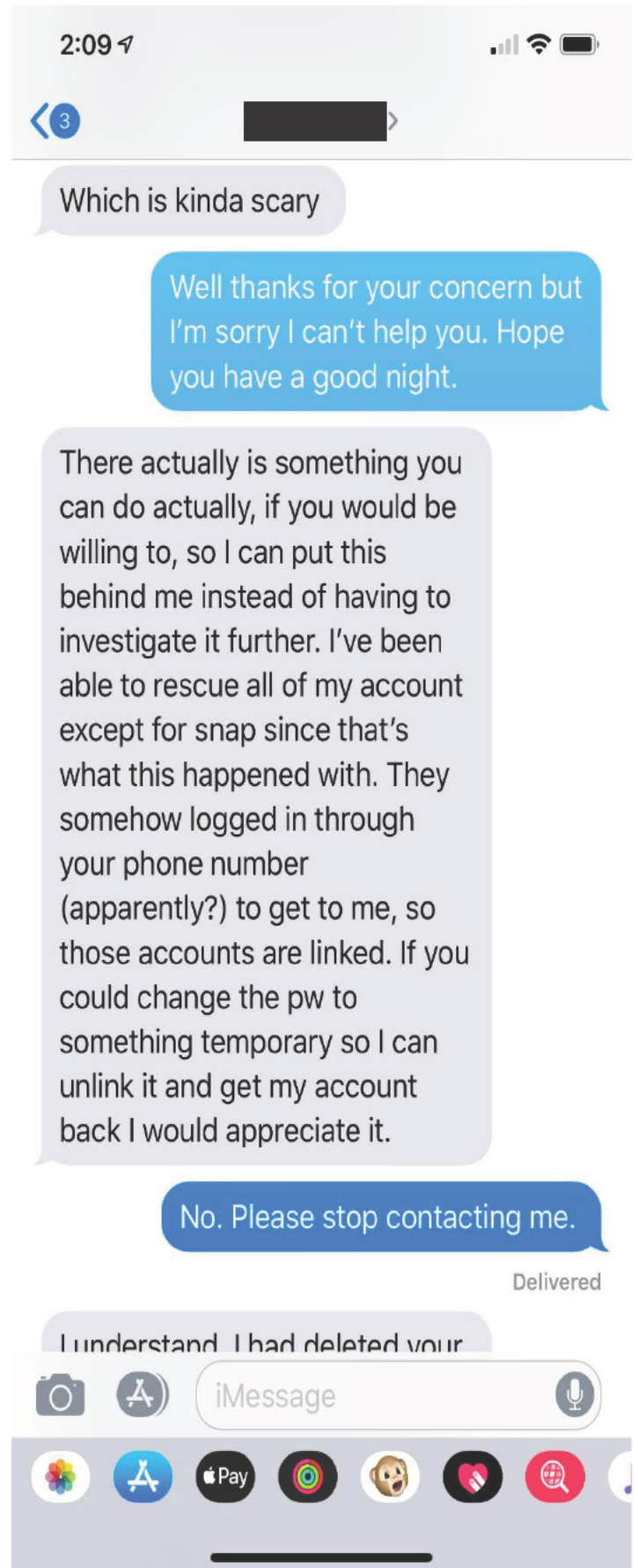
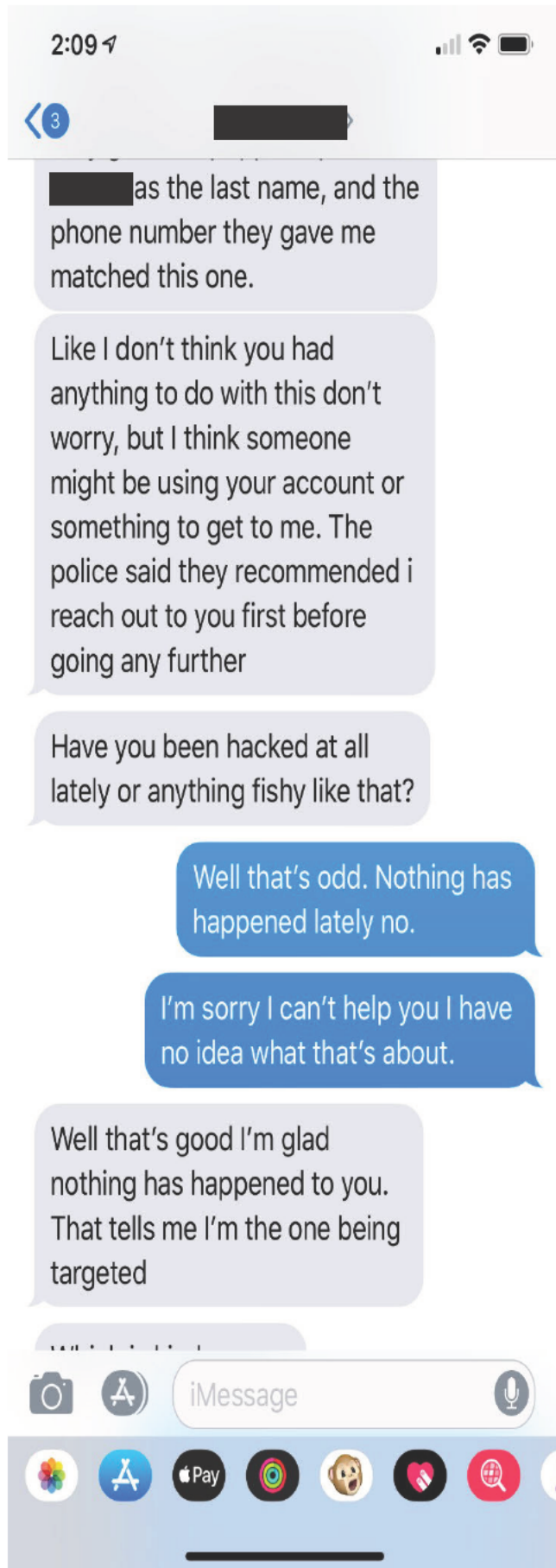
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*Pending IR #00000509*

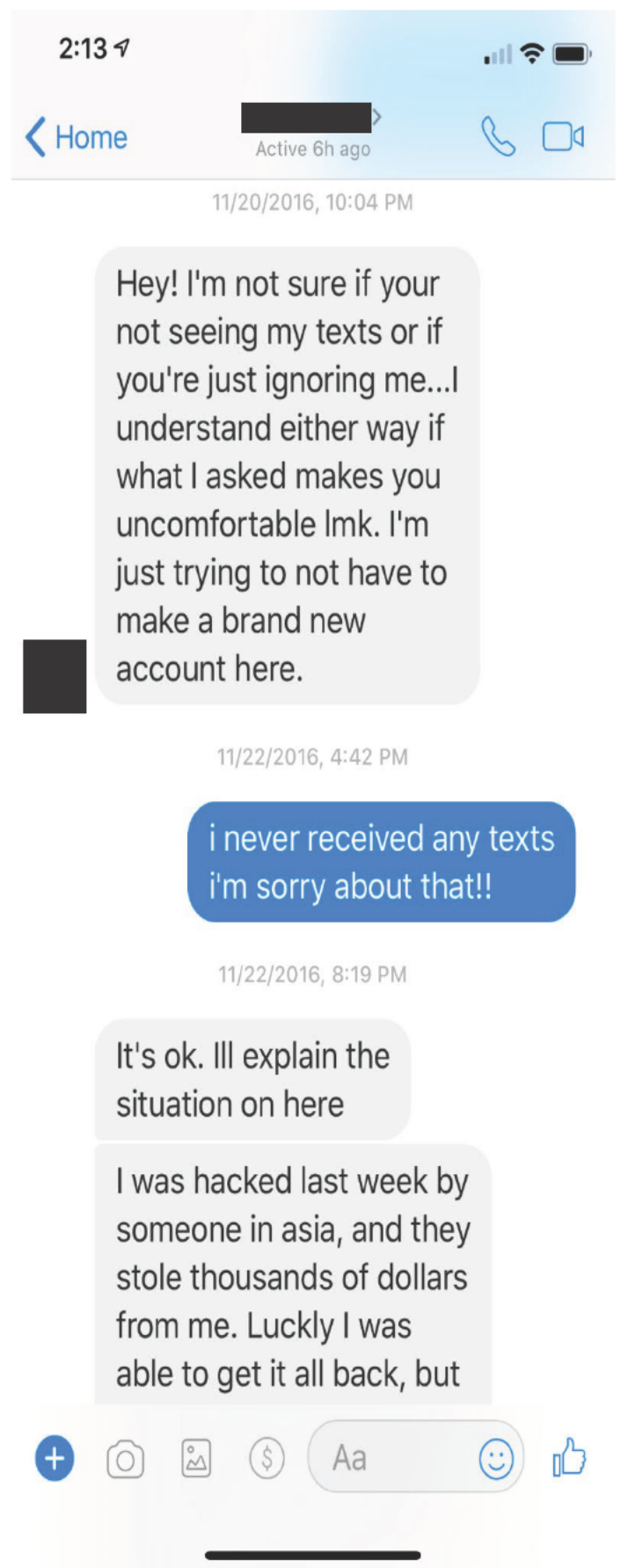
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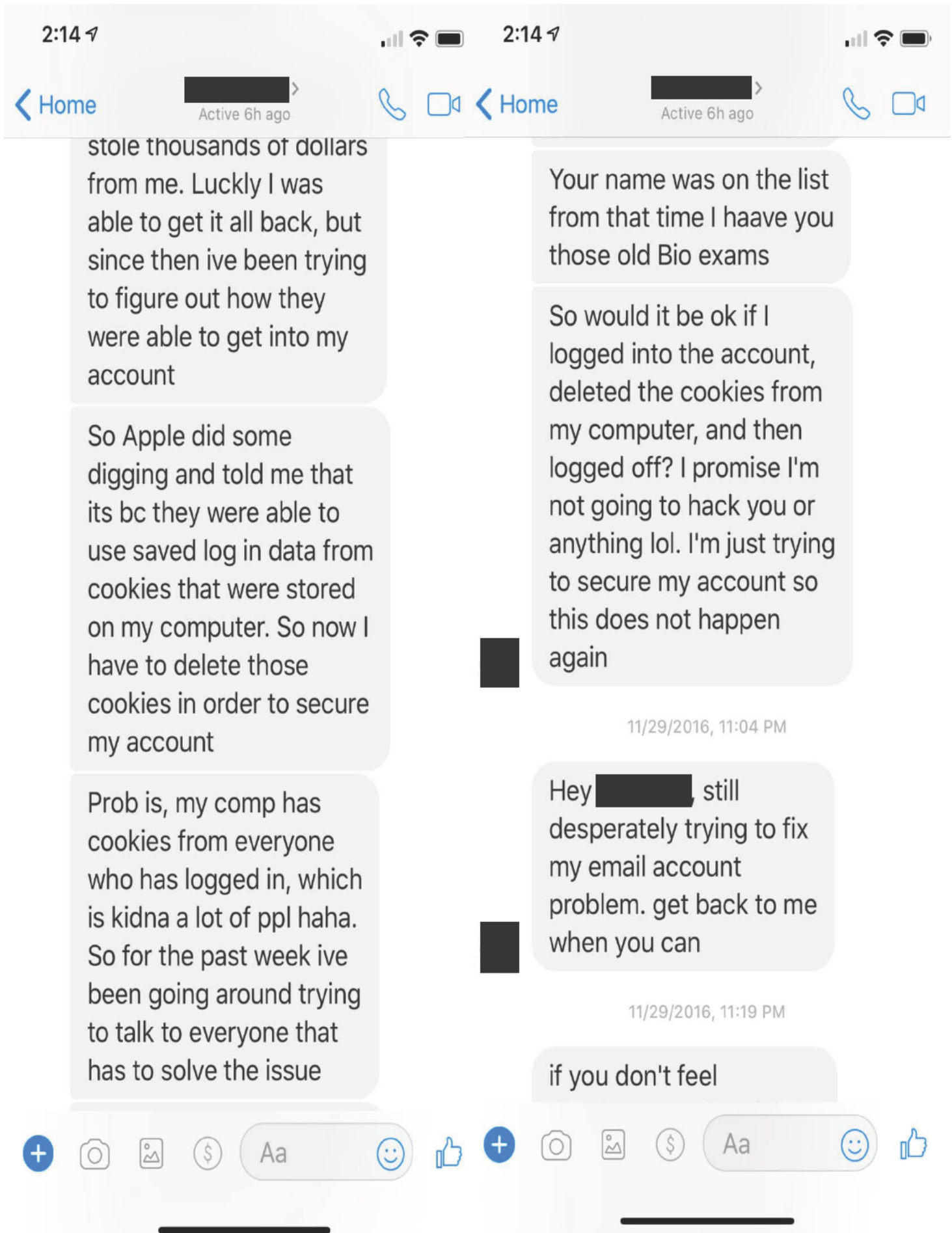
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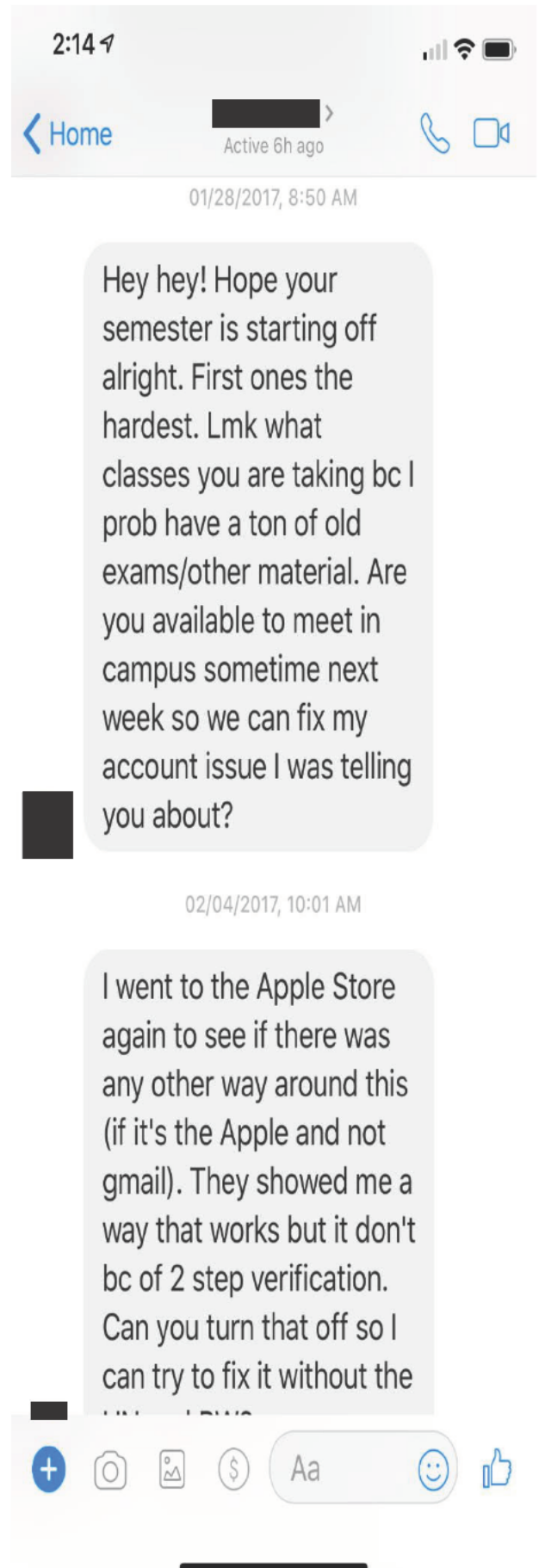
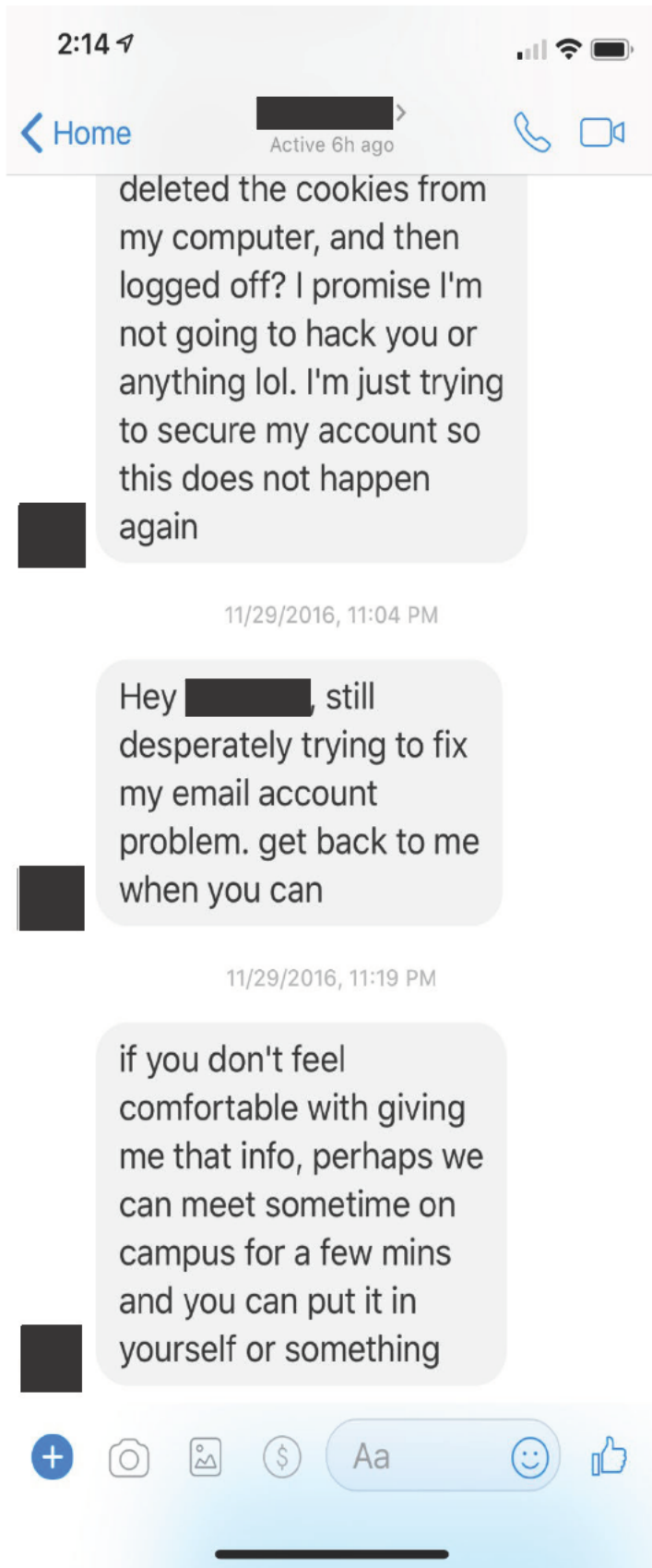




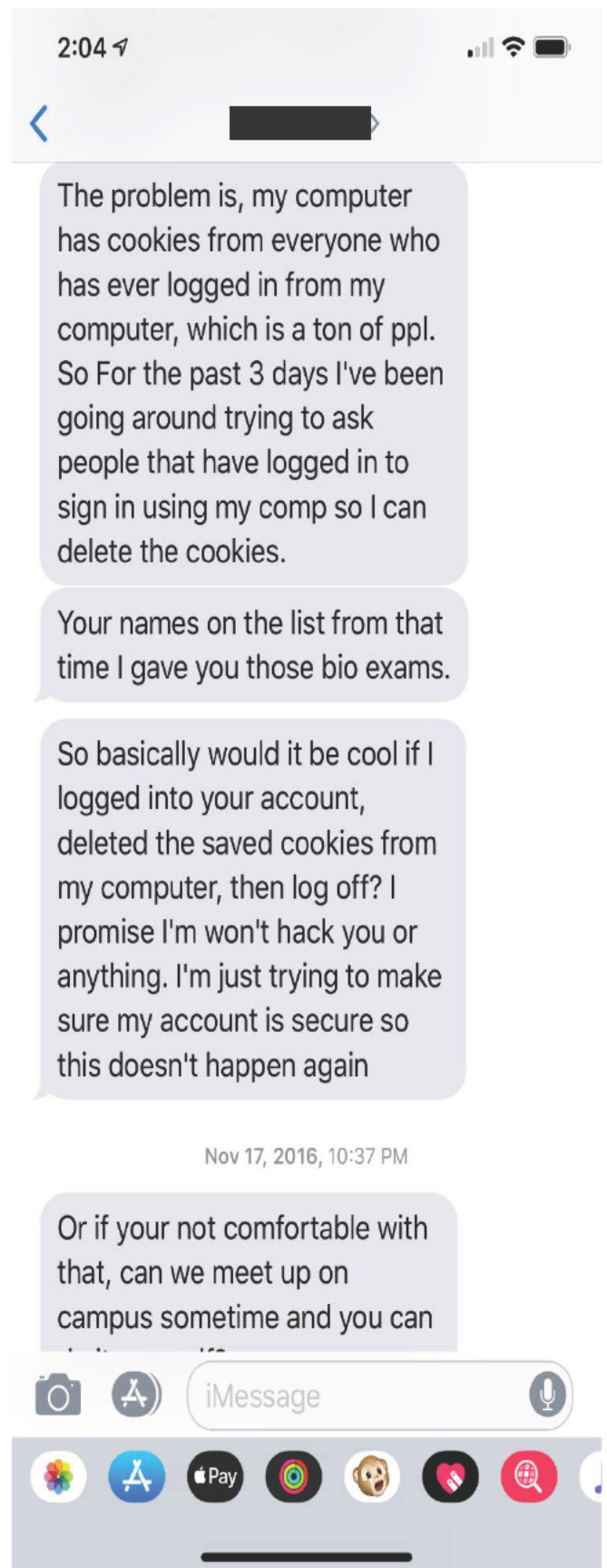
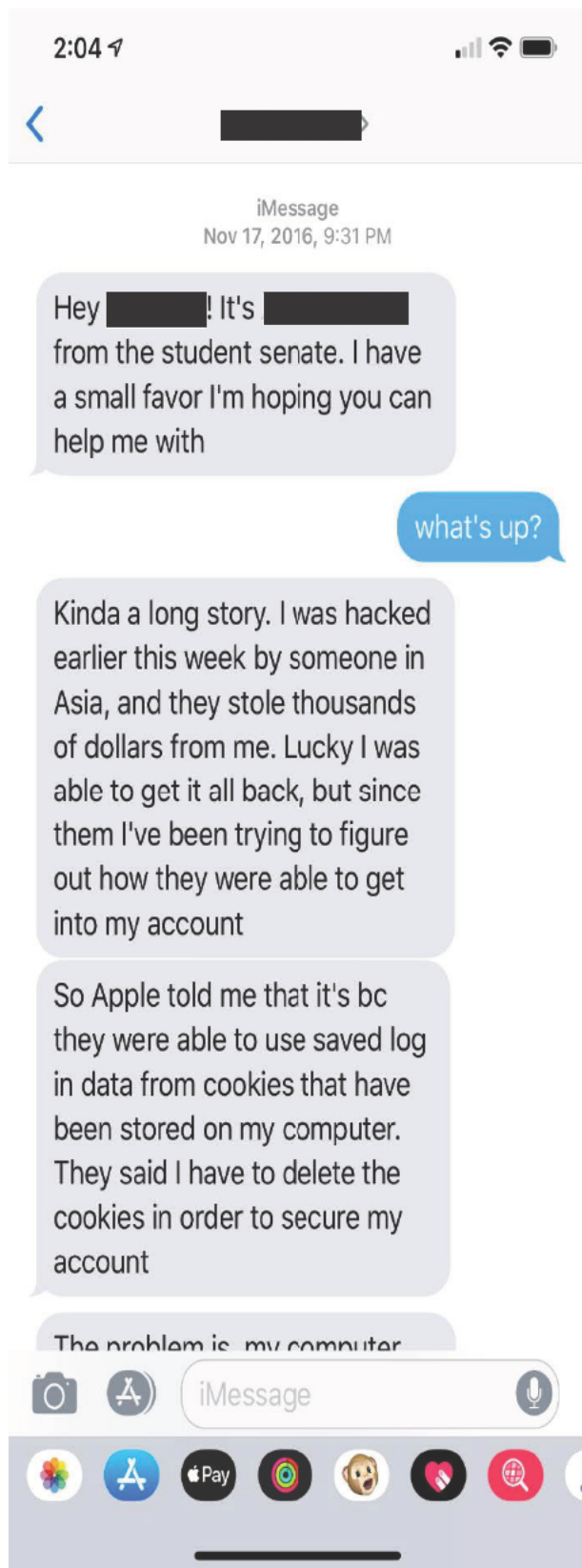




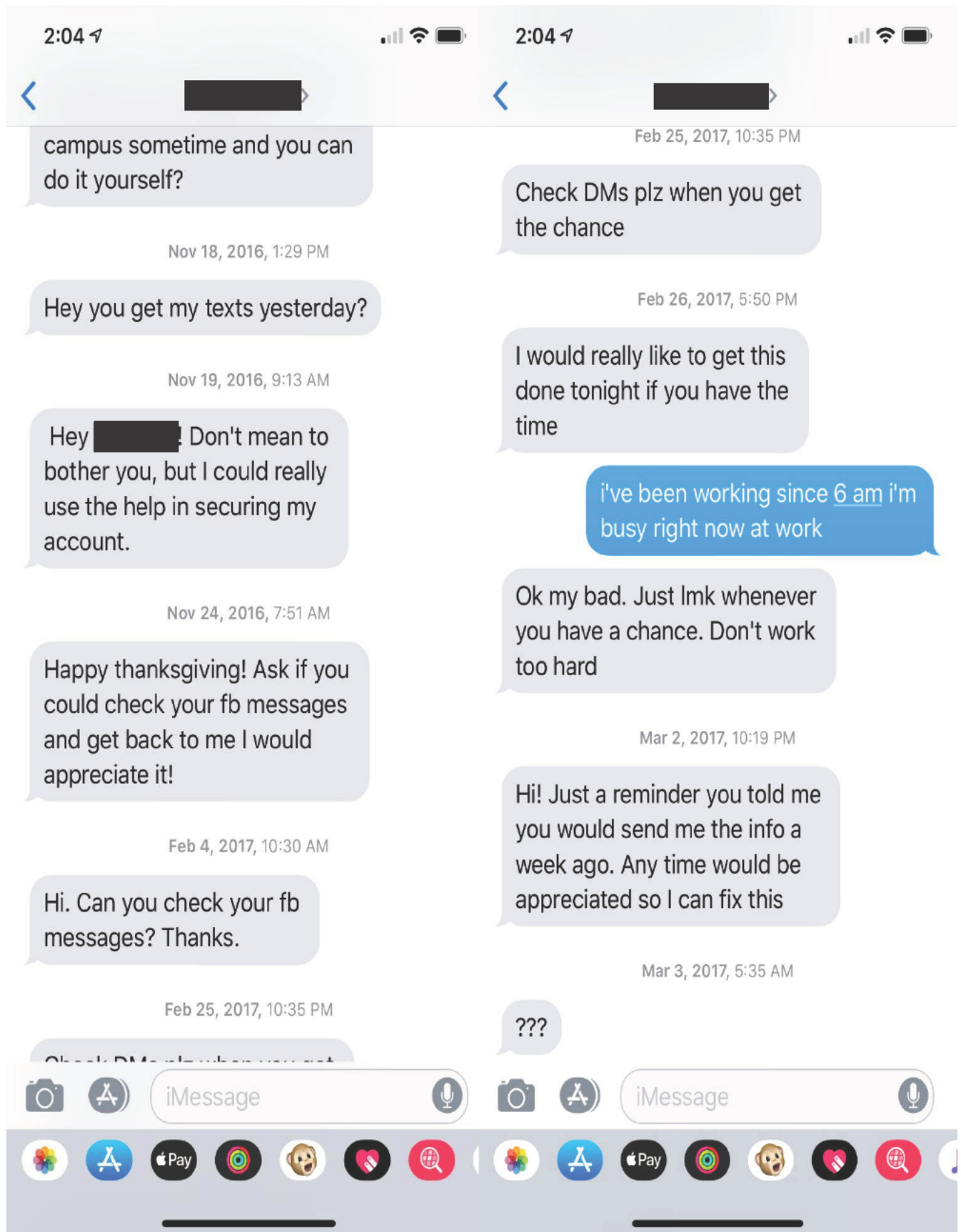


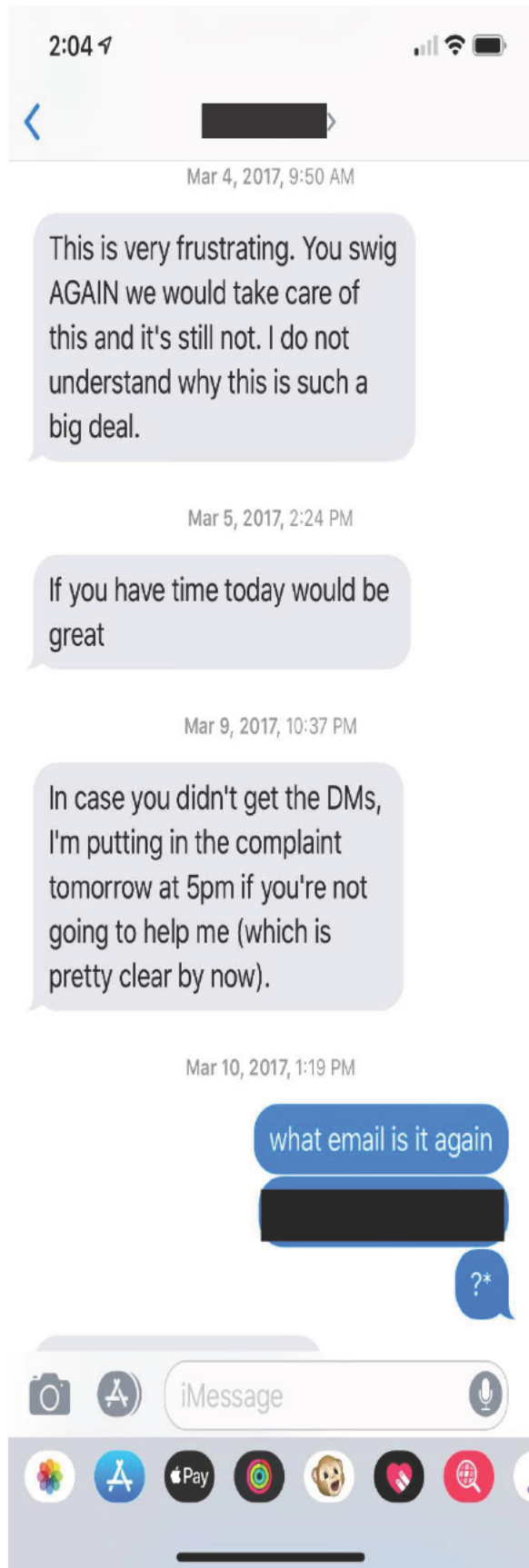


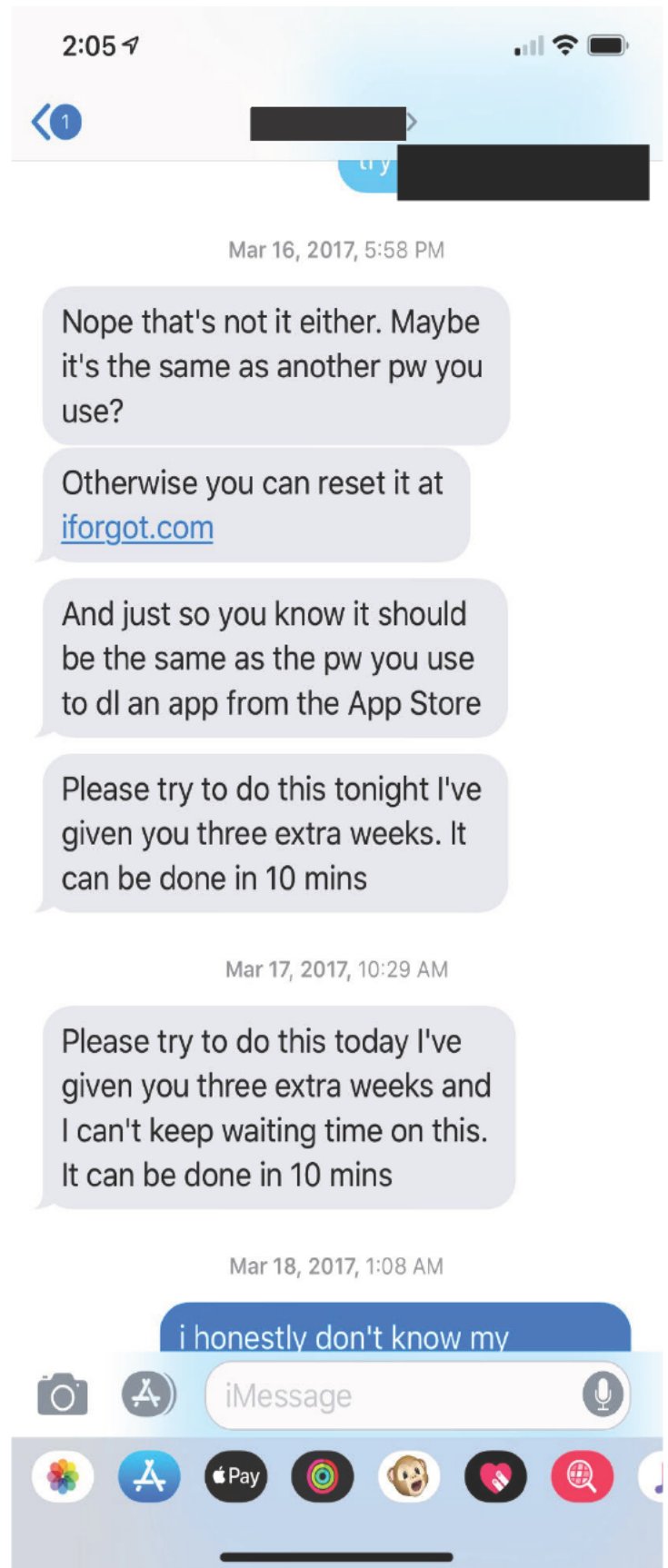


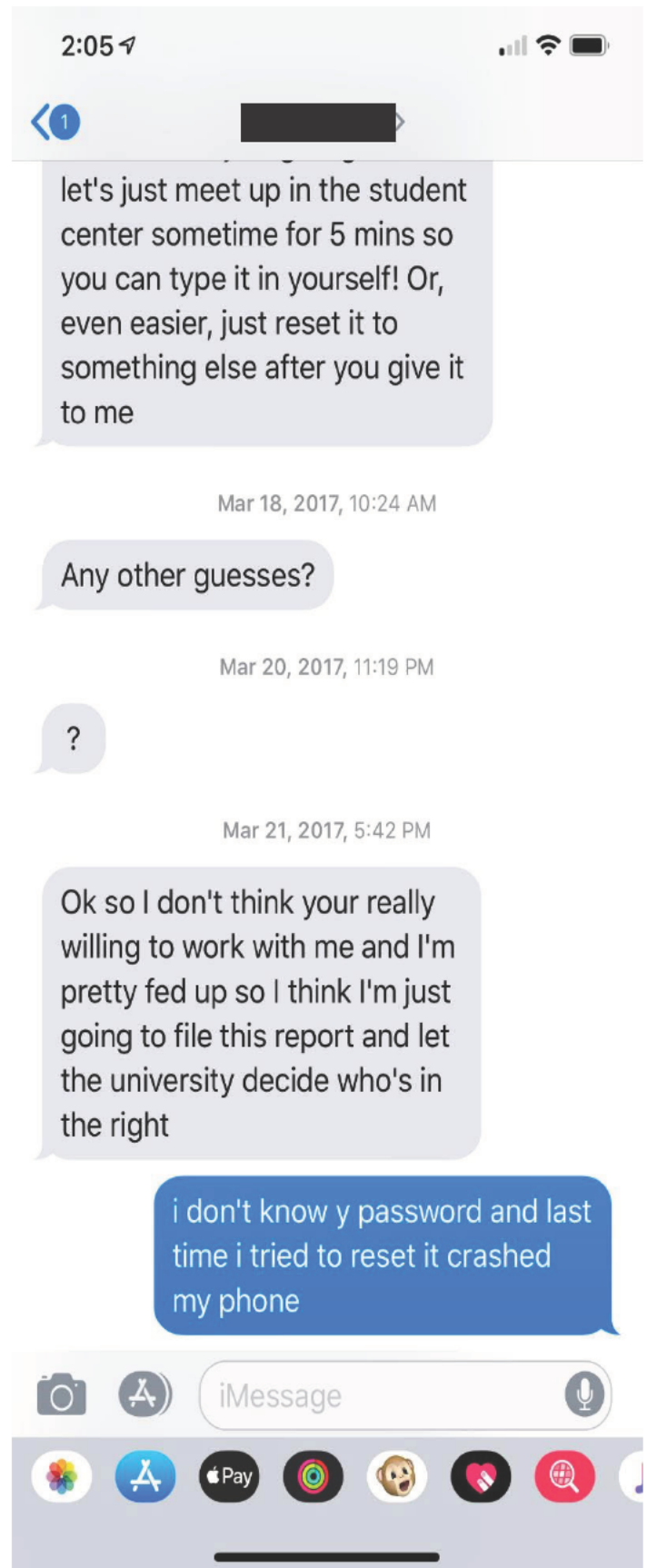
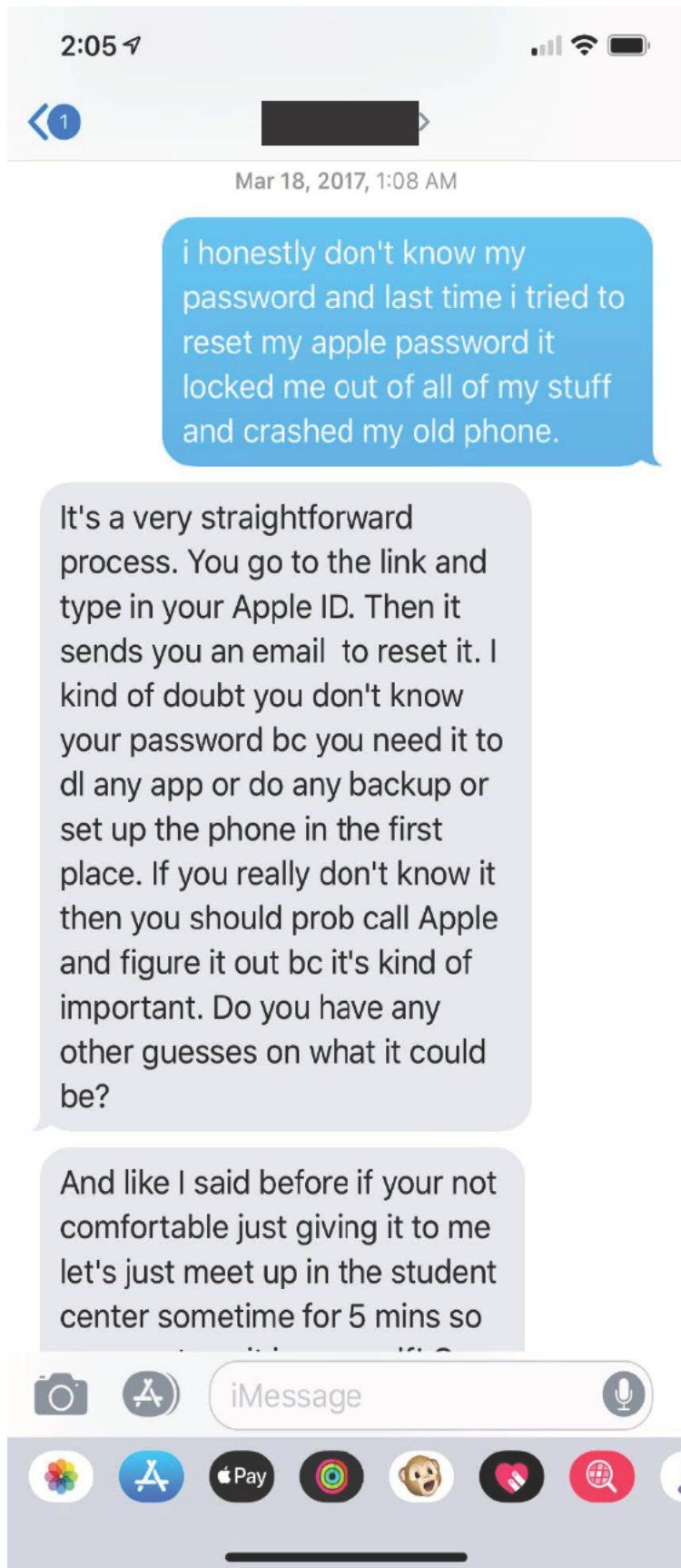
















Mar 24, 2017, 4:05 PM

my apple id for that stuff is my  
dads but i have my own icloud.  
two seperate accounts.

mine is just so i have my own  
icloud.

try [REDACTED]

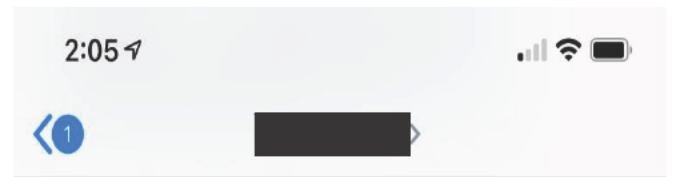
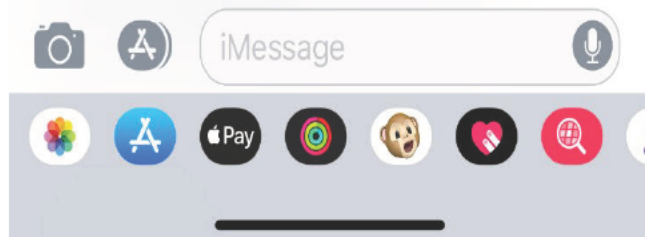
The iCloud one, your own, is the  
one I need bc that's the one I  
put those old exams on. I'll try  
that one and let you know

Mar 24, 2017, 11:51 PM

Yea just got home and tried it.  
Still didn't work. Once again it's  
for the account I put the exams  
one. To check it go to your  
settings -> icloud and it will say  
the email address on top.

Mar 25, 2017, 9:38 AM

Maybe it's a password you made



Mar 25, 2017, 9:38 AM

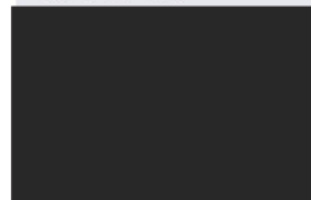
Maybe it's a password you made  
and not your dad?

Mar 25, 2017, 12:21 PM

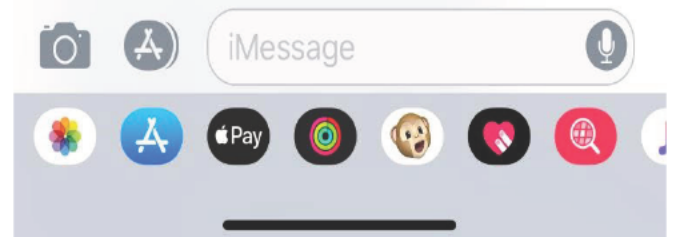
Any ideas?

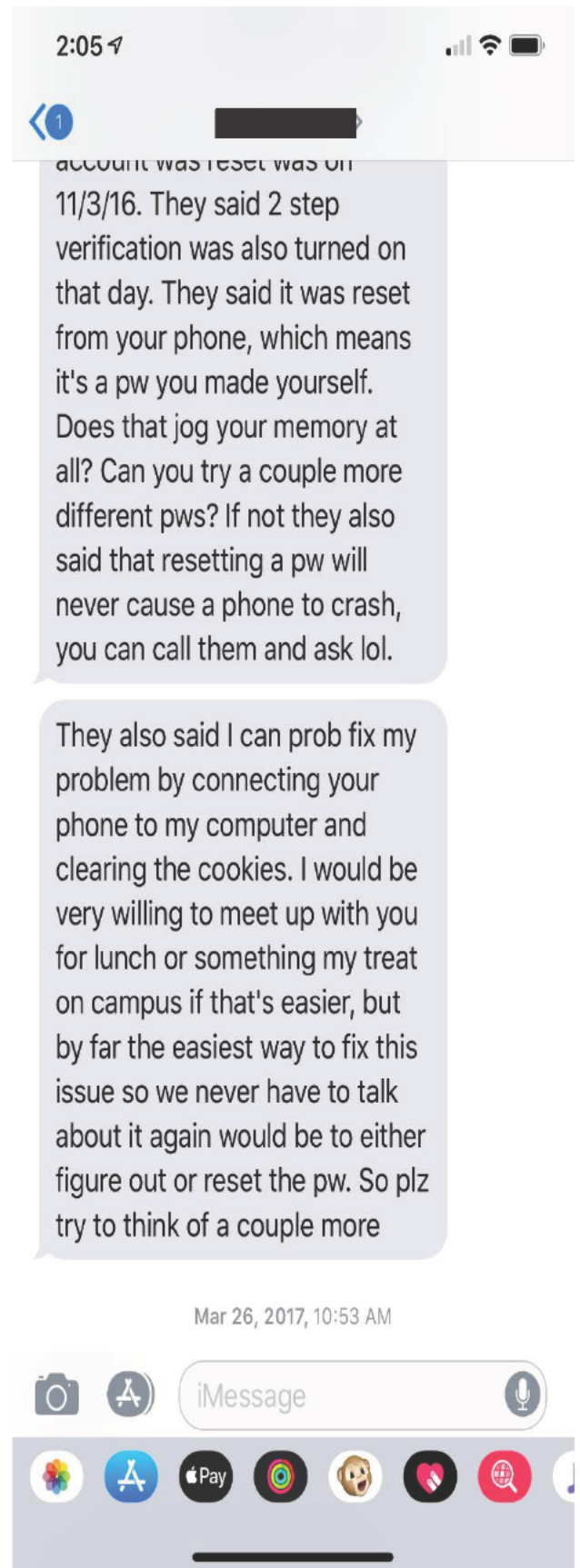
i know how icloud works. last  
time i tried to reset my  
password it crashed my phone.  
no. no ideas. i do not know.

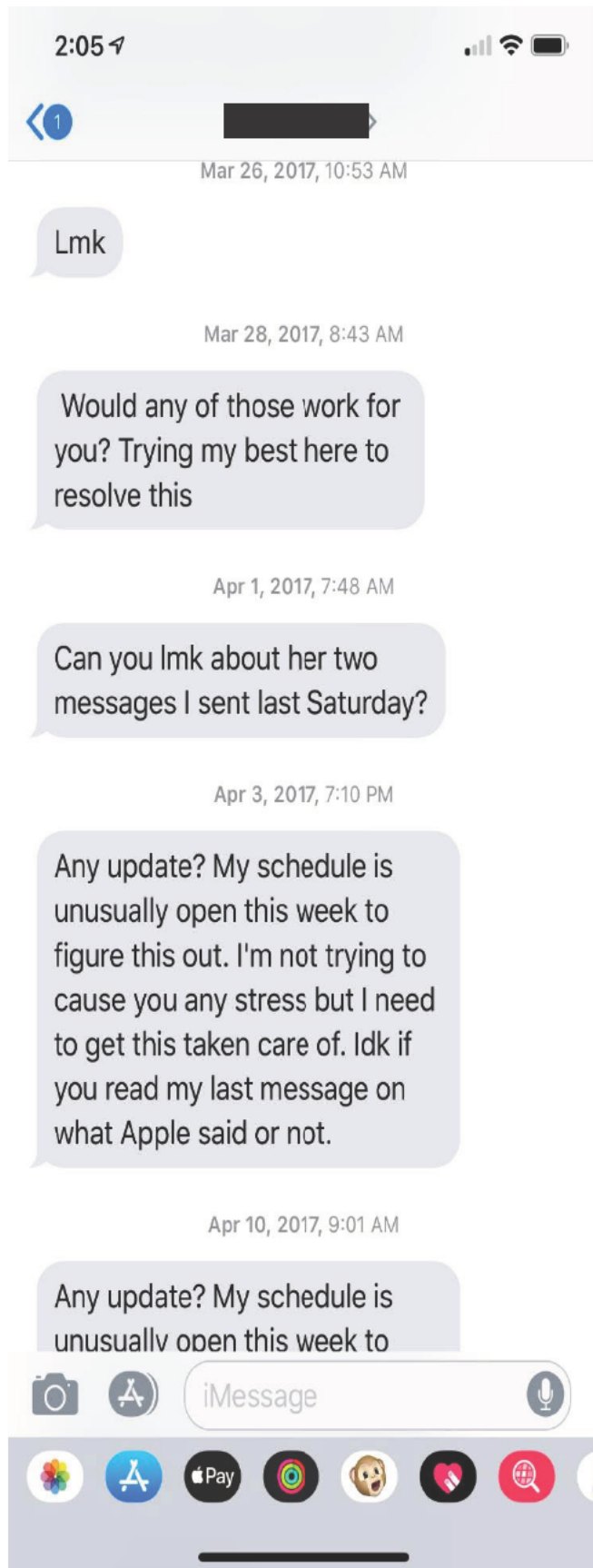
Well I mean your going to have  
to do it eventually in order to dl  
any apps or to back up your  
phone. Just resetting the  
password song crash the  
phone, it must have been a  
coincidence. Here is what we  
tried so far:



Cant\*. It looks like you have two









Division of Academic Affairs  
Dean of Students Office

## INVESTIGATION REPORT

Tuesday, December 4, 2018

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**Incident Reported:** October 26, 2018

**Incident Date:** August 30, 2016 through October 26, 2018

**Complainant:** [REDACTED], former WSU student

**Respondent:** [REDACTED], current WSU medical student

### COMPLAINT

**Harassment and Academic Misconduct:** Specifically, the Complainant reported that the Respondent was harassing her since 2016 and provided her with old Biology exams.

### EVIDENCE

- Complaint Report Form – Reported by Complainant
- Text messages between Complainant and Respondent (submitted by Complainant)
- Respondent Statement
- Screen shot (submitted by Respondent)

### TIMELINE

August 30, 2016	Respondent and Complainant met at FestiFall, student organization fair, near Biology tent at Wayne State University.  Complainant informed Respondent she was on the premed track and taking BIO 1510.
After August 30, 2016	Respondent provided BIO 1510 exam bench mark questions to Complainant.
November 17, 2016	Respondent began sending text messages to Complainant reporting that his account was hacked and he needed her assistance in resolving the matter. Respondent stated that he would offer Complainant BIO exams in text messages.  Complainant sent one text message in response to Respondent.
November 22, 2016	Second text message was sent by Complainant to Respondent 2016.
November 29, 2016	Last text message was sent by Respondent to Complainant in 2016.





Division of Academic Affairs  
Dean of Students Office

January 28, 2017	Respondent began sending text messages again to Complainant asking to meet in order to resolve his account issues and stated that he had old exams/materials for possible classes she was taking.
January 28, 2017- April 10, 2017	Respondent and Complainant sent text messages to one another in reference to the Respondent's hacked account and request for Complainant's account password.
August 6, 2018- October 26, 2018	Respondent sent text messages to Complainant asking her about Alfred Street and stated that his Snap account was hacked. The Complainant sent text messages in response and asked the Respondent to stop contacting her.
October 26, 2018	Respondent sent last text message to Complainant.

### **COMPLAINANT STATEMENT**

The Complainant and AD Nikolina Camaj had a meeting via phone on November 15, 2018. During the meeting, the Complainant reviewed her Complaint Report and confirmed that the statement she documented in the Complaint Report submitted on October 29, 2018 was accurate. The Complainant stated that she would submit text messages sent between her and the Respondent from November 17, 2016 until October 26, 2018.

The Complainant reported that she was being harassed by the Respondent and did inform her parents recently about her concerns. She further confirmed that she filed a police report in Colorado and has since spoken to Wayne State University Police Department. The Complainant then affirmed that she contacted the Wolff-Smith law firm in Lake Orion Michigan to confirm that the email address used did not belong to one of their lawyers. The Complainant added that she contacted the 36<sup>th</sup> District Court House and confirmed that her name was not on the docket for November 15, 2018.

The Complainant established that she has not received further communication from the Respondent as of October 26, 2018. She does not want any further contact with the Respondent. The Complainant has come forward to report the matter so that other students are negatively impacted by the Respondent should he be harassing other WSU students.

### **RESPONDENT STATEMENT**

The Respondent and AD Nikolina Camaj had a meeting in person on November 30, 2018. AD Camaj informed the Respondent that she was investigating a Complaint sent



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Dean of Students Office

to the Dean of Students Office and Medical College. AD Camaj explained that the complaint was in reference to Harassment and Academic Misconduct.

During the meeting, the Respondent confirmed that he knew the Complainant and met her family at the student organization fair (FestiFall) three to four years prior [He corrected his statement when presented with text message evidence and affirmed they met in August 2016.] When asked about the nature of his communication with the Complainant, the Respondent stated that he only sent text messages to the Complainant in an effort to fix his account which he claimed was hacked. [He corrected his statement and confirmed that he also sent her messages on Facebook when presented with text messages.] The Respondent indicated that he did not save any of the text messages between him and the Complainant.

The Respondent detailed that he was pursuing a civil case against the Complainant in the 36<sup>th</sup> District Court as he believes she was the one hacking his accounts. When asked to identify materials he shared with the Complainant in 2016, the Respondent stated that he provided her with text books. [He corrected his statement when presented with text message evidence and affirmed he sent her BIO test/exam "bench mark" questions also.]

When asked if he had a lawyer, the Respondent stated that he did not have a lawyer as he wrote to the Complainant and was searching for legal counsel online. The Respondent also stated that he did not send the email to the Complainant pretending to be a lawyer. He further reported that he did not file a police report as he indicated in his text message to the Complainant. He also acknowledged that it was not the Apple store staff who gave him instructions how to fix his account, but he researched the information online. The Respondent explained that he "stretched the truth", misled the Complainant in his text messages.

Lastly, the Respondent confirmed that he is no longer in contact with the Complainant. When asked why he contacted the Complainant initially, the Respondent explained that he wanted to be friends and help her in her BIO class by providing bench mark exam questions. AD Camaj informed the Respondent that he could submit a statement in reference to the Complaint.

Based on the submitted Complaint form, statements provided, and evidence, I am referring this case to the Wayne State University School of Medicine for adjudication and review.

**Note:**

- The Retaliation policy was reviewed and discussed with the Complainant and Respondent.
- The Respondent and Complainant were instructed to cease all communication with each other and both agreed.

██████████  
Statement regarding reported incident

To Whom It May Concern:

I met ██████████ (and her parents) at Festifall 2016. She was a freshmen student at the time and was clearly stressed about starting school. I introduced myself and we exchanged phone numbers. I later offered her a pdf copy of a few textbooks and old practice test materials for classes that she was taken that I had taken in years past (I had taken some of the same classes, taught by different professors, back in 2010/2011) that were stored on my iCloud account. She was grateful and thanked me for the textbooks.

On social media, I noticed ██████████ had been making frequent posts on Twitter where she was clearly in a depressed state of mind. Posts would range from worrying about performance in school, not sleeping, drug use, and mental illness. At this point, I decided to reach out again to offer support. One text message was particularly embellishing, I suppose in my immaturity I thought that appealing to vanity might help foster a friendship. As was stated at the end of the text message, I wanted *nothing* more than a completely platonic friendship. At the time, I had been dating my significant other for eight years (we will now be celebrating our ten-year anniversary this month). We are both very much in love and I would never do anything to ruin the sanctity of our relationship.

After this happened, I noticed that my iCloud account would routinely be accessed by someone. As I knew ██████████ had access to my account from when I sent her the pdf textbooks, so I thought that it was her that accessing my accounts. I did not know if this was purposeful, and I read on a tech subreddit (on the tech forums of reddit) that the problem may have stemmed from when she accessed my account the first time. At this point, I just wanted my account to be fixed, so I asked ██████████ if she could assist me in either meeting in person, in a public place like a coffee shop, to try to fix it, or changing her password to a different one temporarily so I could try to fix this account (please note, I was not asking for her actual password, but a temporary one that could be changed right after attempting to fix the account). Much of this took place in early 2017. To the best of my recollection, I did not have much communication with her from mid-2017 until August 2018 when I received another message that my account had once again been accessed at an address I thought was connected to her. If there was communication between these times, it was infrequent with months between them.

The last communication I had with ██████████ was on October 27<sup>th</sup>, when I received no less than eight calls from a private number, and then one from a phone number: 719-██████████ in Colorado Springs, CO; that I can only assume was either ██████████ or one of her associates. When I answered the phone, I was told a racial slur and hate speech that made me extremely upset. The person on the line said "enjoy this country while you are still in it, you dirty Arab". I thought about reporting this to the police or to the university, but I did not. I did not think it

would do any good as [REDACTED] was not a student and I didn't want to go through the added stress of filing a police report at the time.

Currently, I have absolutely no communication with [REDACTED]. I deleted her number after the racial slur/hate speech and had already had her blocked on all social media including: Facebook, Instagram, Twitter, and Snapchat. I also do not want any further communication with her at all.

I take full responsibility for the text messages/Facebook messages that were sent to [REDACTED]. I deeply regret how this incident has taken place. I understand that I lied to this person about many things, and I am very sorry about that. I never had a lawyer like I stated I did in the messages, and while I did consider suing for damages in civil court regarding this issue, I never did go file in court for any such damages. I said these things so [REDACTED] would work with me to fix this issues with my account and so she would take me seriously. It was wrong, and I should have been more honest with her. This represents a major character flaw that I know I feel terribly about. I promise that I will be working on myself to fix this flaw, through deep self-reflection and perhaps professional help if deemed necessary. Everyone makes mistakes, and while I try to hold myself to the upmost ethical standards, I myself am not perfect. I am not a frequent liar, and in fact I think I'm terrible at it. This was a onetime incident, and I have no other incidents or relationships like this one that has happened with [REDACTED]. This was a potential friendship gone wrong, and I will be very careful in the future to make sure nothing like this happens ever again.

I have also learned a valuable lesson from this incident. In my own hubris I thought I could handle an issue myself, without thinking how [REDACTED] felt about the situation. This was also a grave mistake. I now know that if anything like this were to happen in the future, I should take it up with the proper authorities such as the police, Apple, and C&IT instead of trying to fix it on my own. In retrospect, If I had done this in the first place, I probably would not have needed [REDACTED]'s assistance at all.

My reputation is very important to me. I am currently in my ninth year of studies at Wayne State University. I have earned three degrees from this institution and am half way through the highest degree that the university bestows upon studetns. During my time here, I have surveyed the community in many different capacities. I was an RA for four years, I was the student body president on main campus, I have volunteered my time in countless student organizations and other places in the community, I am currently the president of my class, participate frequently and present research, and am overall an upstanding student. I have been awarded and recognized for my service in many ways, ranging from major awards from different offices on campus, to scholarships and general recognition. These are only possible because my peers trust me.

During these activities, I have met quite literally thousands of students. I would like to note that this is the first time any student has reported any incident of alleged harassment about me in any form over the last nine years I have been a member of this community.

In my eyes, while these actions do represent a character flaw that I deeply regret, I think it is also important to note that the actions in themselves are not a medical school issue, but rather a civil one. It is not against the student code of conduct of the medical school to mislead a 3<sup>rd</sup> party individual, who was *not a student* at the time the alleged incident took place, about a private matter that has nothing to do with the University, Medicine, or my studies. I also do not think this meets the legal criteria of "harassment", and to the best of my knowledge, I have not been charged with any crime alleging harassment, or any other charges related to this incident. This incident has no bearing, in any way on my studies, and the alleged harassment did not take place on campus grounds. If [REDACTED] would like to file civil charges against me, I would be happy to defend myself in a court of law.

With that said, the fact that I may have hurt [REDACTED], or that she perceived my actions in a different way than what was intended do not sit well with my conscience. I would welcome the opportunity to forgo the racial slur/hate speech and write her a sincere apology letter to try to atone for my actions. If the university could facilitate delivery of this letter somehow, I would appreciate it.

Sincerely,

[REDACTED]